

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSEPH FRIEL, individually and on behalf of
a class of all persons and entities similarly
situated,

Plaintiff,

v.

ETN AMERICA INC. and SHLOMI COHEN,

Defendants.

Civil Action No. 3:25-cv-00882-JKM

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

Defendant ETN America Inc. ("ETN America") and Defendant Shlomi Cohen ("Mr. Cohen") (collectively, "Defendants") respectively move for a two-week extension to answer, move, or otherwise respond to Plaintiff Joseph Friel's ("Plaintiff") Complaint [ECF # 1]. Plaintiff does not oppose this Motion, and has consented to Defendants' request for an extension. In support of the Motion, Defendants state as follows:

- 1) On May 19, 2025, Plaintiff initiated this putative class action by filing a Complaint in this Court, in which Plaintiff asserts claims individually and on behalf of the putative class. *See* ECF # 1.
- 2) Defendants were served on or about June 2, 2025. *Id.* at # 6.
- 3) On June 23, 2025, Defendants retained the undersigned counsel.
- 4) This Court granted Defendants' uncontested motions for an extension to respond to the Complaint on June 24, 2025, July 9, 2025 and July 23, 2025. *Id.* at # 8. *See also Id.* at ## 12-15.

- 5) The Parties have undergone settlement negotiations and have reached a formal written agreement.
- 6) The Parties expect to execute the formal written agreement in the next week.
- 7) Accordingly, to allow the Parties to execute the formal terms of their agreement, the Parties respectfully request that this Court extend the time for which Defendants must answer, move, or otherwise respond to Plaintiffs' Complaint, or alert the Court that final settlement has been reached, up until and to August 25, 2025.
- 8) In accordance with the tentative agreement between the Parties, the Parties expect that within 90 days, the Parties will submit a stipulation of dismissal with prejudice of the above-captioned matter if certain conditions are met.
- 9) Plaintiff consents to a two-week extension.
- 10) Granting the foregoing Motion will not impact any currently set deadlines.
- 11) A Certificate of Concurrence attached hereto confirms that Defendants have sought concurrence in this Motion from Plaintiff, and that Plaintiff does not oppose this Motion.

WHEREFORE, Defendant ETN America Inc. and Defendant Shlomi Cohen respectfully request that the Court grant this unopposed motion and enter an order in the form provided extending the time within which Defendants may answer, move or otherwise respond to the Complaint through August 25, 2025.

Dated: August 11, 2025

Respectfully submitted,

/s/Corey M. Scher

Corey M. Scher, Esquire
Fox Rothschild LLP
2001 Market Street, Suite 1700
Philadelphia, PA 19103
Tel./Fax: (215) 299-2000/2150
cscher@foxrothschild.com